

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.B.,)	CIVIL ACTION FILE
)	
Plaintiff,)	NO. 1:22-cv-01181-JPB
)	
v.)	
)	
RED ROOF INNS, INC., <i>et al.</i> ,)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION TO EXCLUDE AND LIMIT LAY WITNESS
TESTIMONY**

Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC (RRI Defendants) move this Court to enter an order excluding or limiting the testimony of lay witnesses relating to “commercial sex” or “sex trafficking.” As grounds for this Motion, Defendants state that this testimony is not only irrelevant but also inadmissible lay witness testimony under Federal Rule of Evidence 701 and inappropriate character evidence that would prejudice RRI Defendants and confuse the jury. The Court should therefore exclude this evidence.

A Memorandum in Support is contemporaneously filed and incorporated fully.

Dated: October 21, 2024

Respectfully submitted,

/s/ Marcella C. Ducca

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RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 21, 2024

/s/ Marcella C. Ducca _____

Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI I, LLC, and
RRI West Management, LLC*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 21, 2024, a copy of the above was filed with the United States District Court for the Northern District of Georgia and served on counsel of record through the Court's CM/ECF system.

Dated: October 21, 2024

/s/ Marcella C. Ducca

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